

**CAIR**
ILLINOIS**Council on American-Islamic Relations**

Chicago Chapter

28 East Jackson Blvd., Suite 1410, Chicago, IL 60604

Tel 312.212.1520 Fax 312.212.1530 chicago.cair.com**VIA FACSIMILE TRANSMISSION ONLY**

Kenneth C. Robling, Esq.
Marcela D. Sanchez, Esq.
City of Chicago
30 N. LaSalle Street, Suite 1020
Chicago, IL 60602

September 9, 2008

In re Mohammad v. City of Chicago,
United States District Court No. 07 C 6587

Dear Counsel:

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, I am writing to make a final attempt to resolve our discovery dispute in the above-entitled matter, after seeking to reach both of you by telephone this morning. Despite Judge Cole's entry of the Protective Order in this case on September 3, 2008, and Ms. Sanchez's representation to the Court that Defendant's confidential documents would be produced, I still have not received any of these documents. Ms. Sanchez also advised me that the documents were copied in-house, so I do not understand the delay in producing these documents referenced in Defendant's discovery answers dated August 18, 2008.

In addition, I discussed Plaintiff's requests for TARA training materials with Mr. Robling in detail on August 22, 2008 and August 27, 2008. During this last conversation, Mr. Robling represented that I would have an answer concerning the City's position on this issue during the week of September 1, 2008. To date, I have not received any response concerning the TARA training materials, and your only communication regarding discovery was on September 4, 2008, pertaining solely to other complaints of discrimination in the 12th District or the Training Academy.

Please be advised that if we are unable to resolve the above-referenced discovery issues by the close of business today, I will have no choice but to file a Motion to Compel before Magistrate Judge Cole, to be heard on Monday, September 15, 2008. As previously indicated, the requested documents are essential for the depositions that I will be conducting in this matter commencing on September 18, 2008.

Sincerely,

Kevin Vodak
Staff Attorney

Exhibit C